UNITED STATES DISTRICT COURT DISTRICT OF SOUTH DAKOTA SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 18 - 40086

Plaintiff,

INFORMATION

v.

WIRE FRAUD

KRISTIN DEBOER,

18 U.S.C. § 1343

Defendant.

The United States of America, by and through Assistant United States

Attorney Jeremy R. Jehangiri, charges and informs the Court:

On or about May 11, 2016, in the District of South Dakota and elsewhere, the Defendant, Kristin DeBoer, devised and intended to devise a scheme and artifice to defraud the Oglala Sioux Tribe, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises. For the purpose of executing the scheme and artifice, Kristin DeBoer did knowingly cause to be transmitted by means of wire communication in interstate commerce the signals and sounds, all in violation of 18 U.S.C. § 1343, to effectuate the withdrawal of funds from a banking account belonging to the Oglala Sioux Tribe, at The First National Bank of Gordon in Gordon, Nebraska, to an account belonging to All Around Sports, L.L.C., at Idaho Central Credit Union in the State and District of Idaho. The amount of the wire transfer was \$54,000. The Oglala Sioux Tribe is a federally recognized tribe, headquartered in Pine Ridge, South Dakota, with its lands within the exterior boundaries of the Pine Ridge Indian Reservation. Defendant's conduct violated 18 U.S.C. § 1343.

Dated this 25 day of June, 2018.

RONALD A. PARSONS, JR.

United States Attorney

Jerenny R. Jenangiri

Assistant United States Attorney 325 South 1st Avenue, Suite 300 Sioux Falls, South Dakota 57104

Telephone: (605) 330-4400 Facsimile: (605) 330-4410 Penalties:

20 years of custody, a \$250,000 fine, or both; 3 years of supervised release, a violation of any condition of release could result in 2 years additional incarceration on any such revocation; \$100

assessment; forfeiture; restitution.

Date Filed: June _____, 2018